NYD980592562

CITY OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF SCIENCE AND TECHNOLOGY

51 ASTOR PLACE, NEW YORK, N.Y. 10003 (212) 566-2717

JOSEPH T. McGOUGH, JR., Commissioner

EDWARD F. FERRAND, Assistant Commissioner

December 20, 1982

Richard A. Baker, PhD
Chief
Permits Administration Branch
United States Environmental Protection Agency
26 Federal Plaza
New York, New York 10278

SUBJECT: Follow up to issuance of EPA Emergency
ID # NYP000773002 issued August 30, 1982.
Reference EPA Region II letter Sept. 14, 1982.

Dear Dr. Baker:

Removal of hazardous materials from Quanta Resources was completed on December 1, 1982. A summary of all materials removed from Quanta (atch 1) as well as a detailed list of all manifested shipments (atch 2) is hereby provided as you requested. My interim response dated Oct. 22, 82 on New York City efforts at Quanta Resources is also included, for the record, as atch 3.

The removal of all hazardous materials from the 106 tanks on the Quanta Resources facility will complete the immediate removal phase of the defensive actions taken by the City of New York in accordance with the National Oil & Hazardous Substances Contingency Plan. All materials that were an immediate threat to the health and safety of the NYC Public have been removed.

Further efforts, however, will be required at the Quanta Resources site.

1. Determine the extent of PCB contamination of the soil, underground oils and ground water that is under and around the Quanta site.

2. Prepare inactive hazardous waste site remediation plan for removal, containment, or control of PCB contaminated oil & oil on the aquifer.

3. Complete the demolition of buildings, tanks and the removal of other non-hazardous materials that are not an immediate threat to the health and safety of the NYC Public.

All of these activities are in the planned response and site remediation categories listed in the National Oil and Hazardous Substances Contingency Plan. It is the responsibility of the State of New York to ensure that these programs are implemented, reference Environmental Conservation Law, section 3-0301 and the National Oil and Hazardous Substances Contingency Plan, 40 CFR, part 300.

If I can be of any help with information or assistance regarding the Quanta project, please feel free to call me. I thank you for your help in assuring a smooth expedition of the necessary manifests and other paperwork required for this project.

Sincerely,

Gary L. Ott
On Scene Coordinator

GLO/ms

Attachments:

1. Master Summary
2. Detailed Manifest Shipments
3. NYC Letter Oct. 22, 1982, same subject.
4. Copies NYS Manifests 11/9/82 thru 12/1/82.

LAW OFFICES
NOLAN, BELL & MOORE
60 PARK PLACE
TOWER SUITE-1900
NEWARK, NEW JERSEY 07102

201-643-6300

CABLE ADDRESS "NOLA"

JOSEPH M. NOLAN, P. A.
JAMES M. BELL
DANIEL J. MOORE
JOHN J. MULVIHILL
WILLIAM F. McENROE
DANIEL E. STRAFFI
FRANK CARERI, JR.*

*PA. & N.J. BAR

OCEAN COUNTY OFFICE
393 MANTOLOKING ROAD
P. O. BOX 248
MANTOLOKING, N. J. 08738
(201) 477-9500

OF COUNSEL
THOMAS J. O'NEILL

REFER TO FILE NO. 5602

July 22, 1982

United States Environmental
Protection Agency
Region 2
26 Federal Plaza
New York, New York 10278

Attention: Mr. Michael P. Bonchonsky
Acting Director, Enforcement Division

Re: Quanta Resources Corp.

Dear Sir:

This office represents Thomas J. O'Neill, the Trustee in Bankruptcy of Quanta Resources Corp. We have received your letter of July 16, 1982 addressed to Mr. O'Neill relating to the Long Island City facility of Quanta Resources Corp.

On October 6, 1981, Quanta Resources Corp. commenced a proceeding for reorganization under Chapter 11 of the Bankruptcy Code. The proceedings were converted to a liquidation under Chapter 7 on November 12, 1981. On November 18, 1981 Mr. O'Neill was appointed Trustee.

At no time was the facility in Long Island City operated by the Trustee. On June 1, 1982, notice was forwarded to all creditors of Quanta, including the United States Environmental Protection Agency, advising of the Trustee's intention to abandon the Long Island City facility. By Order dated July y, 1982, the Trustee was authorized by the United States Bankruptcy Court to abandon the property. As such, Mr. O'Neill, as Trustee of Quanta Resources Corp., no longer

has any interest in the property in Long Island City, New York. Any further inquiries should be forwarded to the appropriate representative of Quanta Resources Corp. Please call me if you have any questions.

Thank you.

Very truly yours,

NOLAN, BELL & MOORE

By: WILLIAM F. McENROE

WFM

por

Woods

JUL 16 1982

CERTIFIED MAIL --
RETURN RECEIPT REQUESTED

Thomas J. O'Neill, Trustee
c/o Nolan, Bell & Moore
60 Park Place
Newark, New Jersey 07102

Re: Long Island City, New York facility
EPA I.D. No. NYT370010407

Dear Mr. Prashker:

The United States Environmental Protection Agency ("EPA") regulates the handling of hazardous waste under the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. §6901 et seq. Pursuant to the requirements of RCRA and the regulations promulgated thereunder, you notified EPA on October 24, 1980 that you generate, treat, store and dispose of hazardous waste and you submitted a Part A permit application for these activities on November 19, 1980.

Section 3007 of RCRA, 42 U.S.C. §6927, allows EPA to request certain information from parties who handle hazardous waste. Pursuant to the provisions of this Section, we hereby require that you answer the questions posed below. Your reply should be completed and signed by a responsible official of your company, and must be returned to us within 20 calendar days of the date of this letter. Please include your EPA Identification Number, listed above, with your correspondence.

1. 40 CFR Section 265.115 requires that the owner/operator submit to the Regional Administrator certification that the facility has been closed in accordance with the specifications in the approved closure plan. Please submit such a certification for the Long Island City facility, both by the owner or operator and by an independent registered professional engineer.

2. 40 CFR Section 265.114 requires that when closure has been completed, all facility equipment and structures must have been properly disposed of or decontaminated by removing all hazardous waste and residues. Has such decontamination and disposal taken place at the Long Island City facility? Please submit a list of all facility equipment and structures and a notation next to each as to whether it has been decontaminated or disposed of. If neither occurred, please indicate when disposal or decontamination is scheduled.

Your failure to respond to this letter truthfully and accurately within the time provided may subject you to the initiation of an enforcement action under Section 3008 of RCRA, 42 U.S.C. §6928. Such enforcement action may include the assess-

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ment of substantial penalties of up to $25,000 for continued noncompliance. This information request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, Title 44 of the United States Code.

You may, if you so desire, assert a business confidentiality claim covering all or part of the information requested hereby. The claim may be asserted by placing on (or attaching to) the information, at the time it is submitted, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," or "proprietary," or "company confidential." Information covered by such a claim will be disclosed by EPA only to the extent and by means of procedures set forth in Subpart B, Part 2, Code of Federal Regulations (41 FR 36906, September 1, 1976, as modified at 43 FR 39997, September 8, 1978). If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you.

If you have any questions about this letter, you may call Mr. James Woods of my staff, at (212) 264-2462. Your cooperation is appreciated.

Sincerely yours,

Michael P. Bonchonsky
Acting Director
Enforcement Division

bcc: Tom Taccone, 2PM-PA
Janet Debiasio, 2AWM-SW

RCRA/Data Quality
RCRA/NY

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II
26 FEDERAL PLAZA
NEW YORK, NEW YORK 10278

OCT 26 1987

Mr. David Mafrici, P.E.
Chief, Bureau of Hazardous Waste Operations
Division of Hazardous Substances Regulations
NYS Department of Environmental Conservation
50 Wolf Road
Albany, New York 12233-4017

Re: Classification for hazardous waste facilities that have become "Superfund" sites.

Dear Mr. Mafrici:

As we had discussed during our August CNAP meeting, and in response to your letter dated October 16, 1987, this office is attempting to develop procedures for removing illegally closed facilities from the RCRA hazardous waste TSDF universe. This is a two-part problem: removing such facilities from the inspection universe and closing out cases against such facilities.

Your letter of October 6, 1987, in which you confirmed that facilities which are illegally closed and bankrupt or desolved can be referred to the Division of Hazardous Waste Remediation is encouraging in that a new TSDF status code of "C" has been proposed and is currently in the process of being defined and approved by our Headquarters; "C" will refer to any RCRA TSDFs that have been formally referred to the CERCLA program (or a CERCLA-equivalent State program) and where no further action will be pursued at the facility under either the RCRA program or a RCRA-equivalent State program. We expect that this new classification code for TSDF status will be approved and available for use in approximately four months. Facilities placed into this category would not be included in the inspection universe.

As in any case where the TSDF status code is to be modified, adequate documentation for the coding change must be provided. We propose to meet the documentation requirements with the following procedures for cases where the State refers a facility to their CERCLA-equivalent program:

1) This office must receive (1) formal documentation that the RCRA-equivalent State program has referred the facility to its CERCLA-equivalent program (e.g., a memorandum from the Division of Hazardous Substances Regulations which refers the matter to the Division of Hazardous Waste Remediation) and (2) a statement from the RCRA-equivalent State program (i.e., the Bureau of Hazardous Waste Operations) that the State does not intend to pursue any further actions against the facility under the RCRA-equivalent State program.

2) Assuming that this office agrees with the State's decision to remove the facility from the RCRA-equivalent State program, a letter would be sent to your office to indicate our concurrence with the State's decision and to indicate that we will also not pursue any further actions against the facility under the Federal RCRA program.

3) Copies of the three above-mentioned documents and a memorandum requesting the TSDF status be changed to "C" for the facility would then be sent by this office to the Permits Administration Branch, Office of Policy and Management, for processing the requested change into the Hazardous Waste Data Management System ("HWDMS").

In the interim, prior to the availability of the "C" category, this office will receive and acknowledge documentation required from the State as indicated in Steps 1 and 2. Once the "C" category is made available, we will complete Step 3 of the process as described above.

As for the second part of the problem, procedures for closing out cases in HWDMS against "C" category facilities will require further discussion with the Permits Administration Branch and, consequently, cannot be provided at this time.

Any questions or comments regarding the TSDF status code "C" or the development status of procedures for closing out cases in HWDMS should be directed to Susan Lin of my staff, and she may be contacted at (212) 264-5175.

Sincerely yours,

George C. Meyer, P.E.
Chief
Hazardous Waste Compliance Branch
Air and Waste Management Division

bcc: Laura Livingston (2OPM-PA)
Susan Lin (2AWM-HWC)
Ray Slizys (2AWM-HWC)

✓C1105=C C1103=$✓ C119=3✓ CMT ✓ P32 ✓ P33 ✓ due 4-6-88

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-4017

1987 OCT

NYD980592562

OCT 6 1987

Thomas C. Jorling
Commissioner

Mr. George C. Meyer
Chief, Hazardous Waste Compliance Branch
U.S. Environmental Protection Agency
26 Federal Plaza
Region II Office
New York, NY 10278

Dear Mr. Meyer:

At our August CNAPS meeting, it was proposed that a method be developed for handling illegally closed RCRA facilities.

We propose to transfer facilities which are illegally closed and bankrupt or desolved with no forwarding address, to our inactive hazardous waste site program. By filing a Part A, the facility has indicated that hazardous waste was treated, stored, or disposed of on the property. This is sufficient to have a closed site listed as 2A on New York State's inactive hazardous waste site list. The classification indicates that hazardous waste were known to have been at the site but it is unknown as to whether there is present contamination. The following sites have been referred to the Division of Hazardous Waste Remediation:

1. ~~Applied Environmental Services~~ - NYD000632232
2. ~~Edmas Corporation~~ - NYD047648472
3. ~~Three Dimensional Circuits~~ - NYD~~089077418~~
4. ~~Active Steel Drum~~ - NYD003933355
5. ~~Quanta Resources Corporation~~ - NYD980592564
6. ~~Quanta Resources Corporation~~ - NYD980592448
7. ~~Orban Industries~~ - NYD096300561
8. ~~Alpha Portland Cotisca Industries~~ - NYD002225878
9. ~~Mattice Petrochemical~~ - NYD013600259
10. ~~Kosan Industrial Corporation~~ - NYD061949228
11. ~~Reiter Drum & Barrel~~ - NYD000824565
12. ~~Auburn Plastics~~ - NYD010779569
13. ~~Buffalo Tin Plating~~ - NYD002109452
14. ~~Northeast Marine Terminal Company, Inc.~~ - NYD052798261

The Division of Hazardous Waste Remediation can investigate these sites for possible contamination and, if found, search for potential responsible parties. We will inform them if any financial assurance for remediation is available, should it be needed at any of these sites.

It is important that we have a method of removing these facilities from RCRA listing as TSD facilities so that repetative and unnecessary inspections can be avoided. It was suggested that your branch provide us with a CMEL coding, which would allow us to close out our cases against these facilities under RCRA and place the facilities in a separate, not to be inspected listing. Please let us know what this coding should be. Since the transfers are already in progress, the code is required as soon as possible. Mr. John L. Middelkoop, of my staff, is available to answer any questions on the procedures involved, and he may be contacted at (518) 457-0532.

Sincerely,

David Mafrici, P.E.
Chief
Bureau of Hazarodus Waste Operations
Division of Hazardous Substances Regulation

Texas Department of Water Resources
P.O. Box 13087, Capitol Station
Austin, Texas 78711

303

Ticket No. 00552409

TEXAS WASTE SHIPPING—CONTROL TICKET

Accompany NY Manifest # 296 2534

(Please Type or Print Clearly)

(Satisfies TDWR, TDH, U.S. DOT and U.S. EPA requirements for hazardous or class I waste manifest)

PART I: To be completed by Generator (see reverse side for instructions)

Company Name: New York City Dept of Environmental Protection
Business Address: 51 Astoria Place New York, New York
Address From Which Shipment Originates: 37-80 Review Avenue, Long Island City, New York

TDWR/TDH Registration No.: 99999
EPA Gen. #: NYD040159436
Emergency Phone A/C: (212) - 361 - 2424

DESTINATION:

Primary TSD Facility Name: Rollins Environmental Services, Inc.
Business Address: Box 609 Deer Park, Texas
Destination (Site) Address: 2027 Battleground Road Deer Park, Tx.

TDWR/TDH Permit No.: 01429
EPA TSD Fac. #: TXD055141378
Phone A/C: (713) - 479 - 6001

Alternate TSD Facility Name:
Business Address:
Destination (Site) Address:

TDWR/TDH Permit No.:
EPA TSD Fac. #:
Phone A/C:

1. US DOT PROPER SHIPPING NAME	2. US DOT HAZARD CLASS	3. UN/NA NUMBER	4. QUANTITY	UNITS*	5. CONTAINER NO.	TYPE	6. TEXAS WASTE CODE
Waste Polychlorinated Biphenyls - Sludge	ORM-E	NA2315	31	1 2 3 (4)	NA	NA	Sludge - # 151250
				1 2 3 4			
				1 2 3 4			
				1 2 3 4			
				1 2 3 4			
				1 2 3 4			
				1 2 3 4			

* Circle one: (1) tons (2) gallons (3) cubic yards (4) drums (55 gal.)

This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, TDWR, and TDH.

Date of Shipment: 12/01/82

Sig. of Authorized Agent:

PART II: To be completed by the Transporter/Driver (see reverse side for instructions)

Transporter: S-J Transportation
Business Address: Box 91 Woodstown, New Jersey
Phone Number A/C: (609) - 769 - 2741 08098

TDWR/TDH Trans. No.:
EPA Trans. No.: NJD071629976

I certify (or declare) that the materials in the quantities described above are received by me for shipment to the above named destination.

Date Received: 12/01/82

Sig. of Authorized Agent: Carlton Johnson

PART III: To Be completed by Treatment, Storage and Disposal (TSD) Facility Owner/Operator (see reverse side for instructions)

TSD Facility Name: Rollins Environmental Services, (Tx) Inc
Phone Number: 713 - 479-6001
Site Address: 2027 Battleground Road Deer Park, Texas 77536
TSD Facility Owner/Operator Comments:

TDWR/TDH Permit No.: 01429
EPA TSD Fac. No.: TXD055141378

Date Received: 12-8-82

I certify (or declare) that the materials in the quantities described in Part I are received by me.

Rec'd 31-55 Steel S/D

Sig. of Authorized Agent: Hector Ayala

HO 8323-47-Van 31-55 Steel S/D

White - Original Pink - TSD Facility Yellow - Transporter Green - Generator's First Copy

TDWR-0311 (Rev. 5-29-81)

DIVISION OF HAZARDOUS MATERIAL AND WASTE MANAGEMENT
Kentucky Department for Natural Resources and Environmental Protection

HAZARDOUS WASTE MANIFEST

Accompany NY # 2967561

MANIFEST DOCUMENT NUMBER ____

IDENTIFICATION INFORMATION

	ID NUMBER	COMPANY NAME	MAILING ADDRESS	TELEPHONE
GENERATOR	NYD040159436	New York City Dept of Environmental Protection	51 Astor Place New York NY 10003	(212) 566-8977
TRANSPORTER #1	NJD071629976	S-J Transportation	Box 91 Woodstown New Jersey	(609) 769-2741
TRANSPORTER #2 (if required)				
TSDF*	KYD106076988	SEA-BRIGHT Environmental Co	106 North Street Wilder Kentucky	(513) 821-7600

WASTE INFORMATION

CONTAINER(S) NO.	CONTAINER(S) TYPE	HM	DOT SHIPPING NAME, CLASS, & ID NUMBER	TOTAL QUANTITY	WEIGHT	HAZARDOUS WASTE NUMBER	HAZARDOUS WASTE CODE
20	Drums		Polychlorinated Biphenyls ORM-E Contaminated O-Sol Fort UN2315	1100 gals	9000 lbs	N/A	NA

EMERGENCY INFORMATION

National Response Center 800 - 424 - 8802
Division of Hazardous Material & Waste Management 502 - 564 - 6716
CHEMTREC 800 - 424 - 9300
Division of Water 502 - 564 - 3410

CERTIFICATIONS

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, the U.S. Environmental Protection Agency, and the Kentucky Division of Hazardous Material and Waste Management.

[illegible] — GENERATOR REPRESENTATIVE
[signature] — SIGNATURE
12/01/82 — DATE

This is to certify acceptance of the hazardous waste shipment described above.

Carlton Manson — TRANSPORTER #1 REPRESENTATIVE
[signature] — SIGNATURE
12/01/82 — DATE

____ TRANSPORTER # 2 REPRESENTATIVE
____ SIGNATURE
____ DATE

This is to certify acceptance of the hazardous waste shipment described above for ☐ treatment ☐ storage or ☐ disposal.

____ TSDF* REPRESENTATIVE
____ SIGNATURE
____ DATE

* Treatment, Storage, or Disposal Facility

HMWM - 2
Rev. 9/80

RCRA TREATMENT, STORAGE AND DISPOSAL FACILITY INSPECTION FORM
FOR TSD FACILITIES ONLY

COMPANY NAME: Quanta Resources Corporation EPA I.D. Number: NYT370010407

COMPANY ADDRESS: 37-80 Review Avenue

COMPANY CONTACT OR OFFICIAL: Mr. Kenneth Mansfield

OTHER ENVIRONMENTAL PERMITS HELD BY FACILITY:
- [✓] NPDES Sewer Permit From N.Y. City
- [✓] AIR Yes - New York City Department Of Air Resources
- [✓] OTHER Facility Under Consent Order With New York State Department Of Environmental Conservation - Division Of Solid Waste Management

TITLE: (General Plant Manager

INSPECTOR'S NAME: Jerome J. Riordan

DATE OF INSPECTION: Wednesday, July 22, 1980

BRANCH/ORGANIZATION: New York State Department Of Environmental Conservation - Division Of Solid Waste Management

TIME OF DAY INSPECTION TOOK PLACE: Mid-Day

(1) Is there reason to believe that the facility has hazardous waste on site? Yes. Lead (D008) Present in Waste Oil and Chromium (D007) and Cadmium (D006) in samples taken for analysis

a. If yes, what leads you to believe it is hazardous waste? Check appropriate box:

[✓] Company admits that its waste is hazardous during the inspection.

[✓] Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

[✓] The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31) (F004), (F005) Non Halogenated Solvents Can Be Present

[ ] The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)

[✓] The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)

[✓] EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)

[✓] Company is unsure but there is reason to believe that waste materials are hazardous. (Explain) Analyses Of Waste Does Show Hazardous Material As Being Present

	YES	NO	DON'T KNOW
b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?	✓		

Please explain: Tank #31 Contains PCB's Which Are Present With Other Contents In Tank

c. Identify the hazardous wastes that are on-site, and estimate approximate quantities of each. PCB's, Chemicals, Solvents & Heavy Metals Have Been Found Present In Waste Oil, Lubricating Oil, Crankcase Oil, Transmission Oil And Solvents Mixed In With Oil Halogenated And Non-Halogenated Types Of Solvents As Contaminants

	YES	NO	DON'T KNOW
(2) Does the facility generate hazardous waste? No But Can Sludge From Waste Oil Collects After Years of Use of Tanks		✓	
(3) Does the facility transport hazardous waste?	✓		
(4) Does the facility treat, store or dispose of hazardous waste?	✓		

The Facility No Longer Treats Or Processes Waste Oil. Facility Has Discontinued Processing of Waste Oil And At Present Only Stores Waste Oil

47-15-12(5/81)

VISUAL OBSERVATIONS

	YES	NO	DON'T KNOW
(5) SITE SECURITY (§265.14)			
a. Is there a 24-hour surveillance system?	✓		
b. Is there a suitable barrier which completely surrounds the active portion of the facility?	✓		
c. Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?		✓	
(6) Are there ignitable, reactive or incompatible wastes on site? (§265.27)	✓		
b. If "YES", have precautions been taken to prevent accidential ignition or reaction of ignitable or reactive waste?	✓		
d. In your opinion, are proper precautions taken so that these wastes do not:			
- generate extreme heat or pressure, fire or explosion, or violent reaction?	✓		
- produce uncontrolled toxic mists, fumes, dusts, or gases in sufficent quantities to threaten human health?	✓		
- produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions?	✓		
- damage the structural integrity of the device or facility containing the waste?			✓
- threaten human health or the environment?	✓		

24 Hour Per Day 7 Day/Week

a. If "YES", what are the approximate quantities?
ABOUT 110,000 GALLONS WASTE OIL

b. If "YES", have precautions been taken to prevent accidential ignition or reaction of ignitable or reactive waste? BOILER WITH STEAM ON SITE AND STEAM QUENCHING SYSTEM CAN BE UTILIZED

c. If "YES", explain
FOAM QUENCHING SYSTEM TO BE INSTALLED

Please explain your answers, and comment if necessary.

e. Are there any additional precautions which you would recommend to improve hazardous waste handling procedures at the facility?
BETTER HOUSEKEEPING OF AREAS AROUND TANKS
REMOVE, CLEAN UP OIL SOAKED DEBRIS.
(CLEAN, PAINT TANKS) REPAIR, (CLEAN) PAINT STAIRWELLS.

(7) Does the facility comply with preparedness and prevention requirements including maintaining: (§265.32)

	YES	NO	DON'T KNOW
- an internal communications or alarm system?	✓		
- a telephone or other device to summon emergency assistance from local authorities?	✓		
- portable fire equipment? FIRE EXTINGUISHERS	✓		
- adequate aisle space?	✓		
- in your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.	✓		

REQUIRE ALL PROCEDURES TO COVER FIRE, HOSPITAL, UPSET CONDITION AND SPILLS (WASTE OIL)

In your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.

ALL OF ABOVE PROCEDURES — COMMUNICATIONS AND ALARM IF TANKS ARE FILLED TO CAPACITY, TELEPHONE TO OBTAIN HELP AND ASSISTANCE AND SUMMON EQUIPMENT

		YES	NO	DON'T KNOW
*(8)	Have you inspected to verify that the groundwater monitoring wells (if any) mentioned in the facility's groundwater monitoring plan (see no. 19 below) are properly installed?		✓	
	If you have, please comment, as appropriate.			
(9) a.	Is there any reason to believe that groundwater contamination already exists from this facility? If "YES", explain. OIL SOAKED AREA BY RAILROAD SIDING AS RESULT OF BROKEN PIPE	✓		
b.	Do you believe that operation of this facility may affect groundwater quality?		✓	
c.	If "YES", explain.			

RECORDS INSPECTION

(10)	Has the facility received hazardous waste from an off-site source since Nov. 19, 1980 (effective date of the regulations)?	✓		
a.	If "YES", does it appear that the facility has a copy of a manifest for each hazardous waste load received? NOT FOR INDEPENDENT WASTE HAULERS WHO PICK UP WASTE OIL FROM GASOLINE STATIONS TO FACILITY SITE		✓	
b.	How many post-November 19 manifests does it have? (If the number is large, you may estimate) OVER 1000 MANIFESTS APPEARED TO BE AT FACILITY SITE PLANT HEADQUARTERS OFFICE (MAIN) IN LODI, NEW JERSEY			
c.	Does each manifest (or a representative sample) have the following information?			
	- a manifest document number	✓		

* This requirement applies only after November 19, 1981.

	YES	NO	DON'T KNOW
- the generator's name, mailing address, telephone number, and EPA identification number	✓		
- the name, and EPA identification number of each transporter	✓		
- the name, address and EPA identification number of the designated facility and an alternate facility, if any;	✓		
- a DOT description of the wastes COMBUSTIBLE LIQUID NA 1270	✓		
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle	✓		
- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA.	✓		
d. Are there any indications that unmanifested hazardous wastes have been received since November 19, 1980? If YES, explain.		✓	
(11) Does the facility have a written waste analysis plan specifying test methods, sampling methods and sampling frequency? (§265.13)	✓		

a. Does the character of wastes handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? WASTE OILS VARY AS TO TYPES INCLUDE LUBRICATING (WITHIN LIMITED PARAMETERS) OILS, CRANKCASE OILS, TRANSMISSION OILS.
(You may check more than one)
Waste characteristics vary ✓
All wastes are basically the same ✓
Company treats all waste as hazardous ✓
Don't Know ____

	YES	NO	DON'T KNOW
b. Does hazardous waste come to this facility from off-site sources?	✓		
c. If waste comes from an off-site source, are there procedures in the plan to insure that wastes received conform to the accompanying manifest? WASTE OIL MATERIAL TESTED FOR BULK SEDIMENT & WATER, & FOR FLASH & FIRE AS REQUIRED - COMPOSITE SAMPLES COLLECTED, COMBINED FOR CHEMICAL ANALYSES.	✓		

(12) INSPECTIONS (§265.15)

	YES	NO	DON'T KNOW
a. Does the facility have a written inspection schedule? PHYSICAL DAILY INSPECTION OF ACTIVE AREAS OF TANKS IN USE		✓	
b. Does the schedule identify the types of problems to be looked for and the frequency for inspections? GENERAL OBSERVATIONS - OBVIOUS PROBLEMS	✓		
c. Does the owner/operator record inspections in a log?		✓	
d. Is there evidence that problems reported in the inspection log have not been remedied? If "YES," please explain.			

	YES	NO	DON'T KNOW

(13) PERSONNEL TRAINING (§265.16)

a. Is there written documentation of the following:

- job title for each position at the facility related to hazardous waste management and the name of the employee filling each job? (JOB TITLE - UNION JOBS) ✓
- type and amount of training to be given to personnel in jobs related to hazardous waste management? ON JOB EXPERIENCE PERSONNEL THERE FOR YEARS ✓
- actual training or experience received by personnel? ON JOB EXPERIENCE ✓

(14) Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosion or any unplanned release of hazardous waste? (§265.51) ✓

a. Does the plan describe arrangements made with local authorities? ✓

b. Has the contingency plan been submitted to local authorities? ✓

How do you know? SPCC PLAN FILED WITH APPLICATION WHEN SITE WAS USED AS TREATMENT FACILITY

c. Does the plan list names, addresses, and phone numbers of Emergency Coordinators? ✓

d. Does the plan have a list of what emergency equipment is available? ✓

e. Is there a provision for evacuating facility personnel? ✓

f. Was an Emergency Coordinator present or on call at the time of the inspection? ✓

(15) Does the owner/operator keep a written operating record with: (§265.73)

- a description of wastes received with methods and dates of treatment, storage or disposal? RECORDS OF INCOMING & OUTGOING SHIPMENTS ✓
- location and quantity of each waste? KNOW WHICH TANKS USE FOR WASTE OIL STORAGE ✓
- detailed records and results of waste analysis and treatability tests performed on wastes coming into the facility? RECORDS OF WASTE OIL ANALYSES OF SAMPLES TAKEN FOR WASTE OIL ✓
- detailed operating summary reports and description of all emergency incidents that required the implementation of the facility contingency plan? ✓

*(16) Does the facility have written closure and post-closure plans? (§265.110) ✓

a. Does the written closure plan include:

- a description of how and when the facility will be partially (if applicable) and ultimately closed?

* Effective date for this requirement is May 19, 1981.

	YES	NO	DON'T KNOW
- an estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility?	___	___	___
- a description of the steps necessary to decontaminate facility equipment during closure?	___	___	___
- a schedule for final closure including the anticipated date when wastes will no longer be received and when final closure will be completed?	___	___	___
b. What is the anticipated date for final closure?	___	___	___
†c. Does the owner/operator have a written post-closure plan identifying the activities which will be carried on after closure and the frequency of these activities?	___	___	___
d. Does the written post-closure plan include:			
- a description of planned groundwater monitoring activities and their frequencies during post-closure?	___	___	___
- a description of planned maintenance activities and frequencies to ensure integrity of final cover during post-closure?	___	___	___
- the name, address and phone number of a person or office to contact during post-closure?	___	___	___
*(17) Does the owner/operator have a written estimate of the cost of closing the facility? (§265.142) What is it?	___	✓	___
*(18) Does the owner/operator have a written estimate of the cost for post-closure monitoring and maintenance? What is it? (§265.144)	___	✓	___
	___	___	___
*(19) Has a groundwater monitoring plan been submitted to the Regional Administrator for facilities containing a surface impoundment, landfill or land treatment process? (This requirement does not apply to recycling facilities.) (§265.90)	Not Applicable		
a. Does the plan indicate that at least one monitoring well has been installed hydraulically upgradient from the limit of the waste mangement area?	___	___	___
b. Does the plan indicate that there are at least three monitoring wells installed hydraulically downgradient at the limit of the waste management area?	___	___	___

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† This section applies only to disposal facilities.

* Effective date for this requirement is May 19, 1981.

SITE-SPECIFIC

Please circle all appropriate activities and answer questions on indicated pages for all activities circled. When you submit your report, include only those site-specific pages that you have used.

STORAGE	TREATMENT	DISPOSAL
Waste Pile p. 9	Tank p. 8	Landfill pp. 10-11
Surface Impoundment p. 8	Surface Impoundment pp. 8-9	Land Treatment pp. 9, 10
Container p. 7	Incineration pp. 12-13	Surface Impoundment p. 8
Tank, above ground p. 8	Thermal Treatment pp. 12-13	Other _____
Tank, below ground p. 8	Land Treatment pp. 9-10	
Other _____	Chemical, Physical p. 13 and Biological Treatment (other than in tanks, surface impoundment or land treatment facilities)	
	Other _____	

CONTAINERS (§265.170) Not Applicable

	YES	NO	DON'T KNOW
1. Are there any leaking containers? If "YES", explain.	___	___	___
2. Are there any containers which appear in danger of leaking? If "YES", explain.	___	___	___
3. Do wastes appear compatible with container materials?	___	___	___
4. Are all containers closed except those in use?	___	___	___
5. Do containers appear to be opened, handled or stored in a manner which may rupture the containers or cause them to leak?	___	___	___
6. How often does the plant manager claim to inspect container storage areas?			
7. Does it appear that incompatible wastes are being stored in close proximity to one another? If "YES", explain.	___	___	___
8. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?	___	___	___
9. What is the approximate number and size of containers with hazardous wastes?			

TANKS (§265.190)

	YES	NO	DON'T KNOW
1. Are there any leaking tanks? If "YES", explain. Several Unused Rusted Tanks & Corroded Condition - Not In Use	✓		
2. Are there any tanks which appear in danger of leaking. If "YES", explain. Several Tanks In Rusted And Corroded Condition - Not In Use	✓		
3. Are wastes or treatment reagents being placed in tanks which could cause them to rupture, leak, corrode or otherwise fail? If "YES", explain.		✓	
4. Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?	✓		
5. Where hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow? Pumps Used, Valves To Stop Inflow, High Level Tank Alarm System	✓		
6. Does it appear that incompatible wastes are being stored in close proximity to one another, or in the same tank? If "YES", explain. Facility Takes In Waste Oil, Lubricating Oil, And Oil Sludge (Transmission Oil, Crankcase Oil, etc.) Are Stored Temporarily		✓	
7. How often does the plant manager claim to inspect container storage areas? Routine Daily Inspection			
8. Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction? Covered If "YES", explain. Tanks Used To Store Waste Oil	✓		
9. What is the approximate number and size of tanks containing hazardous wastes? Currently Using Only Five (5) Tanks For Storage Of Waste Oils			

SURFACE IMPOUNDMENTS (§265.220) Not Applicable

	YES	NO	DON'T KNOW
1. Is there at least 2 feet of freeboard in the impoundment?			
2. Do all earthen dikes have a protective cover to preserve their structural integrity? If "YES", specify type of covering.			
3. Is there reason to believe that incompatible wastes are being placed in the same surface impoundment? If "YES", explain.			

	YES	NO	DON'T KNOW
4. Are ignitable or reactive wastes being placed in surface impoundments without being treated to remove these characteristics? If "YES", explain.	___	___	___
5. Are there any leaks, failures or is there any deteriorization in the impoundments? If "YES", explain.	___	___	___

6. Give the approximate size of surface impoundments (gallons or cubic feet).

WASTE PILES (§265.250) Not Applicable

1. Is the waste pile protected from wind erosion?	___	___	___
a. Does it appear to need such protection?	___	___	___
b. Explain what type of protection exists.			
2. Does it appear that incompatible wastes are being stored in the same waste pile? If "YES", explain.	___	___	___
3. Is leachate run-off from a pile a hazardous waste? If "YES", explain this determination and answer (a) and (b) below.	___	___	___
a. Is the pile placed on an impermeable base that is compatible with the waste?	___	___	___
b. Is the pile protected from precipitation and run-on?	___	___	___
4. In your judgment, are ignitable or reactive wastes managed in such a way that they are protected from any material or conditions which may cause them to ignite? Please explain or indicate if no such wastes are present.	___	___	___
Are they placed on an existing pile so that they no longer meet the definition of ignitable or reactive waste? Please explain.	___	___	___

5. How many waste piles are on site, and approximately how large are they?

LAND TREATMENT (§265.270) Not Applicable

1. Can the facility operator demonstrate that the hazardous waste has been made less or non-hazardous by biological degradation or chemical reactions occurring in or on the soil?
Please explain.

	YES	NO	DON'T KNOW

Not Applicable

*2. Is run-on diverted away from the active portions of the land treatment facility?	___	___	___
*3. Is run-off collected?	___	___	___
4. Are food chain crops being grown on the facility property?	___	___	___
a. If "YES", can the facility operator document that arsenic, lead and mercury:			
- will not be transferred to the crop or ingested by food chain animals or	___	___	___
- will not occur in greater concentrations in the crops grown on the land treatment facility than in the same crops grown on untreated soils.	___	___	___
b. Has notification of the growing of the food chain crops been made to the Regional Administrator?	___	___	___
5. Is there a written and implemented plan for unsaturated zone monitoring?	___	___	___
6. Are there records of the application dates, application rates, quantities and location of each hazardous waste placed in the facility?	___	___	___
7. Do the closure and post-closure plans address:			
a. control of migration of hazardous wastes into the groundwater?	___	___	___
b. control of run-off, release of airborne particulate contaminants?	___	___	___
c. compliance with requirements for the growth of food-chain crops (if they are present)?	___	___	___
8. Is ignitable or reactive waste immediately incorporated into the soil so the resulting waste no longer meets that definition? If "YES", explain.	___	___	___
9. Are incompatible wastes placed in the same land treatment area? If "YES", explain.	___	___	___
10. What is the area of the land receiving hazardous waste treatment?	___	___	___

LANDFILLS (§265.300) Not Applicable

†1. Is run-on diverted away from the active portions of the landfill?	___	___	___
†2. Is run-off from active portions of the landfill collected?	___	___	___

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* Effective date for these requirements is May 19, 1981.

† These requirements are effective November 19, 1981.

N. Applicable

	YES	NO	DON'T KNOW
3. Is waste which is subject to wind dispersal controlled? Explain.	___	___	___
4. Does the owner/operator maintain a map with:			
- the exact location and dimensions of each cell.	___	___	___
- the contents of each cell and approximate location of each hazardous waste type	___	___	___
5. Do the closure and post-closure plans address:			
- control of pollutant migration via ground water?	___	___	___
- control of surface water infiltration?	___	___	___
- prevention of erosion?	___	___	___
6. Is ignitable or reactive waste treated before being placed in the landfill? Explain how you know.	___	___	___
7. Are precautions taken to insure that incompatible wastes are not placed in the same landfill cell? If "NO", explain.	___	___	___
8. Are bulk or non-containerized wastes containing free liquids placed in the landfill? If "YES",	___	___	___
a. Does the landfill have a liner which is chemically and physically resistant to the added liquid?	___	___	___
b. Is the waste treated and stabilized so that free liquids are no longer present?	___	___	___
*9. Are containers holding liquid waste or waste containing free liquids placed in the landfill?	___	___	___
10. Are empty containers (e.g. those containing less than 1/2 inch of liquid) placed in the landfills?	___	___	___
If so, are they crushed flat, shredded or similarly reduced in volume before they are buried?	___	___	___

11. What is the approximate area of the hazardous waste landfill?

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* Effective date for this requirement is November 19, 1981.

INCINERATORS AND THERMAL TREATMENT (§§265.340 and 265.379)

Not Applicable

	YES	NO	DON'T KNOW
1. What type of incinerator or thermal treatment is at the site (e.g. waterwall incinerator, boiler, fluidized bed, etc.)?			
2. Was hazardous waste being incinerated or thermally treated during your inspection? If "YES", answer all following questions. If "NO", answer only questions 3 and 7.	___	___	___
3. Has waste analysis been performed (and written records kept) to include:			
- heating value of the waste	___	___	___
- halogen content	___	___	___
- sulfur content	___	___	___
- concentration of lead	___	___	___
- concentration of mercury	___	___	___

NOTE: Waste analysis need not be performed on each waste load if if there are documented data available to show waste characteristics that do not vary. If there are such documented data available, check here [ ].

4. Does it appear that the owner/operator brings his thermal treatment process to steady state (normal) conditions of operation before introducing hazardous wastes?	___	___	___
5. Did it appear during your inspection that there was adequate monitoring and inspection by owner/operator every 15 minutes during hazardous waste incineration for:			
- waste feed	___	___	___
- auxiliary fuel feed	___	___	___
- air flow	___	___	___
- incinerator temperature			
- [illegible]	___	___	___
- scrubber pH	___	___	___
- [illegible]			
Every hour for:			
- stack plume (color and opacity)	___	___	___
5. Is there open burning of hazardous waste?	___	___	___

a. If "YES", what is being burned? (only burning or detonation of explosives is permitted)

b. If open burning or detonation of explosives is taking place, approximately what is the distance from the open burning or detonation to the property of others?

	YES	NO	DON'T KNOW
6. Does the incinerator appear to be operating properly? (Do emergency shutdown controls and system alarms seem to be in good working order?) Please explain.	—	—	—
a. Is there any evidence of fugitive emissions?	—	—	—
7. Is the residue from the incinerator treated by the owner as a hazardous waste? Please explain.	—	—	—

8. What types of air pollution control devices (if any) are installed on the incinerator?

CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (§265.400) Not Applicable

1. Does the treatment process system show any signs of ruptures, leaks, or corrosion? Please explain.	—	—	—
2. Is there a means to stop the inflow of continuously-fed hazardous wastes?	—	—	—
3. Is there ignitable or reactive waste fed into the treatment system?	—	—	—
If "YES", has it been treated or protected from any material or conditions which may cause it to ignite or react? If so, explain how.	—	—	—
Are the incompatible wastes placed in the same treatment process? If "YES", explain.	—	—	—

5. Describe the treatment system at this facility.